

# **ATTACHMENT B**

EXCERPT FROM COMED'S APPLICATION FOR REHEARING  
IN DOCKET 10-0467

**STATE OF ILLINOIS**  
**ILLINOIS COMMERCE COMMISSION**

COMMONWEALTH EDISON COMPANY	:	
	:	No. 10-0467
Proposed general increase in electric rates	:	

**VERIFIED APPLICATION FOR REHEARING OF**  
**COMMONWEALTH EDISON COMPANY**

representative sample as part of its primary/secondary analysis, because ComEd provided data for all of the nearly 6,400 circuits at issue. ComEd Init. Br. at 113-14; ComEd Rep. Br. at 118.

- VI.C.1.a.v. Cost of Service and Allocation Issues—Contested Issues—Embedded Cost of Service Study Issues—Primary/Secondary Split—Review of Other Utilities Treatment of Primary/Secondary Issues: The Order (at 184-85) errs in concluding that ComEd’s examination of the tariffs of other utilities did not satisfy the requirements of the RDI Order to review other utilities’ methods in differentiating primary and secondary systems and costs and that ComEd somehow did not factor its examination of other utilities into its primary/secondary analysis. ComEd Init. Br. at 114-15; ComEd Rep. Br. at 119-20.
- VI.C.1.b. Cost of Service and Allocation Issues—Contested Issues—Embedded Cost of Service Study Issues—Other Primary/Secondary Split issues—4kv asset allocation: ComEd seeks rehearing on the Order’s conclusion that it conduct this customer-specific cost study (at 190-91) only insofar as it requires such study to be part of ComEd’s initial rate case filing. ComEd Init. Br. at 116; ComEd Rep. Br. at 120.
- VI.C.1.c. Cost of Service and Allocation Issues—Contested Issues—Embedded Cost of Service Study Issues—Investigation of Assets Used To Serve Extra Large Load Customer Class: ComEd seeks rehearing on the Order’s conclusion that it conduct this customer-specific cost study (at 191, 195-96) only insofar as it requires such study to be part of ComEd’s initial rate case filing. ComEd Init. Br. at 116; ComEd Rep. Br. at 120.
- VI.C.1.i. Cost of Service and Allocation Issues—Contested Issues—Embedded Cost of Service Study Issues—Indirect Uncollectible Costs and Uncollectible Costs: ComEd seeks rehearing on the Order’s conclusion that it should somehow segregate indirect costs associated with uncollectible costs (at 204) only insofar as it requires the study of these costs to be part of ComEd’s initial rate case filing. ComEd Init. Br. at 121-22; ComEd Rep. Br. at 126.
- VI.C.1.j.ii. Cost of Service and Allocation Issues—Contested Issues—Embedded Cost of Service Study Issues—Customer Care Cost Allocation—Direct Operation and Maintenance Costs vs. Total Costs: The Order (at 213) errs in concluding that ComEd ignored the mandate in the RDI Order with respect to the pool of costs for ComEd to analyze. As Staff pointed out, the RDI Order was unclear regarding the proper pool of costs for ComEd to analyze: “the Commission did not provide sufficient direction to determine what costs should be included in the analysis of customer care costs. Consequently, ComEd interpreted the term ‘these costs’ in the Final Order to mean direct O&M costs.” ComEd Init. Br. at 126; ComEd Rep. Br. at 128-29; ComEd BoE at 88-89.
- VII.C.1. Rate Design—Contested Issues—SFV: The Order (at 231-32) errs in concluding that SFV should only apply to 50% of fixed delivery costs, because the

Order's analysis clearly supports ComEd's original proposal to recover in fixed charges 60% of total Commission-approved delivery costs in the first year, 70% in the second year, and 80% thereafter. ComEd Init. Br. at 137-40; ComEd Rep. Br. at 133-41; ComEd BoE at 90-93; ComEd RBoE at 121-27.

- VII.C.3.a. Rate Design—Contested Issues—Class Definitions—Residential Rate Design—Consolidation of Classes: The Order (at 249-50) errs in declining to adopt ComEd's proposal to consolidate the residential rate classes. The evidence presented by ComEd and Staff supported ComEd's proposal to reduce the number of residential delivery classes from four to two and thereby eliminate the distinction in distribution rates between electric space heating customers and non-electric space heating customers. ComEd Init. Br. at 140-41; ComEd Rep. Br. at 141-43; ComEd BoE at 93-95; ComEd RBoE at 128.
- VII.C.3.b. Rate Design—Contested Issues—Class Definitions—New Primary Voltage Delivery Class vs. Primary Subclass Charges: The Order (at 255-56) incorrectly states that ComEd proposed to consolidate all of the customers in the Small Load, Medium Load, Large Load, Very Large Load and Extra Large Load Delivery Classes. ComEd presented a new Primary Voltage (PV) Delivery class for the Commission's consideration, which would consist of a subset of customers from the Small Load, Medium Load, Large Load, Very Large Load and Extra Large Load delivery classes that take service at a primary voltage (*i.e.*, 4kV, 12kV, or 34kV) because those customers receive similar on-property distribution facilities. ComEd Init. Br. at 142-44; ComEd Rep. Br. at 143-46; ComEd BoE at 95-97; ComEd RboE at 128-29.
- VII.C.4.c. Rate Design—Contested Issues—Non-Residential—Railroad customers—Utilization of Railroad Customers' Facilities: ComEd seeks rehearing on the Order's requirement that ComEd submit a report regarding its use of these facilities (at 273-75) for clarification as to the nature and components of the required report. For example, the Order states that ComEd's report on Railroad facilities should "include a description of any modification to Railroad Customer equipment, the solution required, and an estimate of the cost that each Railroad Customer would likely bear for the required modification, if the solution were implemented." Order at 273. ComEd requests that the Order be clarified to refer to the "cost that each Railroad Customer would likely bear for the required modifications to ComEd's facilities." ComEd has no way of predicting how the Railroads would manage the modifications of their own facilities or how much cost they would incur. ComEd Init. Br. at 146; ComEd Rep. Br. at 148.
- VII.C.4.d. Rate Design—Contested Issues—Non-Residential—Dusk to Dawn Street Lighting: ComEd seeks rehearing on the Order's adoption of the Chicago Method (at 279-80) for clarification that the current adoption is not to be construed as a precedent mandating the use of the Chicago Method for future cost allocation. ComEd Init. Br. at 146; ComEd Rep. Br. at 148; ComEd BoE at 97-98; ComEd RBoE at 129.